

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

---

GILBERTO PEREIRA BRITO, FLORENTIN	)	
AVILA LUCAS, JACKY CELICOURT,	)	
	)	
Petitioners,	)	
	)	
v.	)	C.A. No. 1:19-cv-11314-PBS
	)	
WILLIAM P. BARR, U.S. Attorney General, <i>et al.</i> ,	)	
	)	
Respondents.	)	
	)	

---

**RESPONDENTS' SUPPLEMENTAL NOTICE TO PREVIOUSLY FILED  
COMPLIANCE CERTIFICATION WITH JUDGMENT**

Respondents William P. Barr, *et al.*, (“Respondents” or “the Government”) hereby file this notice to supplement the previously filed compliance certification (ECF No. 100). Pursuant to the Court’s November 27, 2019 Memorandum and Order (ECF No. 88), the undersigned counsel for the Government hereby submits the following:

1. The Court ordered the Government to provide class counsel for Petitioners with a list containing various information for each member of the Post-Hearing class by January 3, 2020. ECF No. 88 at 23. The Court also ordered the Government to file a copy of that list with the Court. *Id.*

2. On January 3, 2020, the undersigned counsel for the Government provided the initial list given to him by the Department of Homeland Security (“DHS”) to Petitioners’ class counsel and filed the same list with the Court. *See* ECF No. 100 at Exh. A.

3. On January 18, 2020, Petitioners’ counsel contacted the undersigned counsel and stated that they discovered two additional individuals who appeared to be Post-Hearing class members in this case.

4. After counsel for the Government discussed the matter with DHS, counsel for both parties conducted a conference call on Friday, January 24, 2020. During the call, the Government notified Petitioners that DHS conducted an initial review process to identify Post-Hearing class members in early December 2019. Further, DHS's subsequent review showed that at least one individual received a bond hearing during DHS's original review period. Thus, due to the timing of the individual's transition from the Pre-Hearing class to the Post-Hearing class, he was unintentionally omitted from the list of Post-Hearing class members.

5. The Government further notified Petitioners that DHS's remedial review for any additional Post-Hearing class members was still ongoing. The conference call ended with the Government agreeing to provide Petitioners with an update on DHS's review on Wednesday, January 29, 2020.

6. On January 29, 2020, the Government notified Petitioners that DHS completed its second review and forwarded DHS's supplemental list of Post-Hearing class members to Petitioners. The supplemental list is attached as Exhibit A.

Accordingly, in conjunction with the Government's previously filed notice of compliance (ECF No. 100), and to the best of the undersigned counsel's knowledge, the Government has now complied with the Court's November 27 Order.

Date: January 31, 2020

Respectfully submitted,

JOSEPH H. HUNT  
Assistant Attorney General  
Civil Division

WILLIAM C. PEACHEY  
Director, District Court Section  
Office of Immigration Litigation

ELIANIS N. PÉREZ  
Assistant Director  
District Court Section  
Office of Immigration Litigation

/s/ Huy M. Le  
HUY M. LE  
M.A. BBO No. 697256  
Trial Attorney  
United States Department of Justice  
Civil Division  
Office of Immigration Litigation  
District Court Section  
P.O. Box 868, Ben Franklin Station  
Washington, D.C. 20044  
Telephone: (202) 353-4028  
Facsimile: (202) 305-7000  
E-mail: Huy.M.Le2@usdoj.gov

*Attorneys for Respondents*

**CERTIFICATE OF SERVICE**  
Civil No. 1:19-cv-11314-PBS

I hereby certify that this document will be filed through the electronic filing system of the Court, which system will serve counsel for all parties.

Dated: January 31, 2020

*/s/ Huy M. Le*

By: HUY M. LE  
Trial Attorney